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Counsel for all Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

BAKER RANCHES, INC., a Nevada Corporation, DAVID JOHN ELDRIDGE AND RUTH ELDRIDGE, as Co-Trustees of the DAVID JOHN ELDRIDGE AND RUTH ELDRIDGE FAMILY LIVING TRUST, dated January 31, 2007; ZANE JORDAN; and JUDEE SCHALEY,
Plaintiffs,
v.
DEB HAALAND, in her official capacity as Secretary of the United States Department of the Interior, the UNITED STATES DEPARTMENT OF THE INTERIOR, SHAWN BENGE, in his official capacity as Acting Director of the National Park Service, the NATIONAL PARK SERVICE, and JAMES WOOLSEY, in his official capacity as Superintendent of the Great Basin National Park, Defendants.

Case No. 3:21-cv-00150- GMN-WGC

**UNOPPOSED MOTION FOR
EXTENSION OF TIME IN WHICH TO
FILE RESPONSE TO MOTION FOR
ORDER TO SHOW CAUSE (ECF NO.
9)
(First Request)**

1 Defendants Deb Haaland, in her official capacity *et al.* and Plaintiffs Baker Ranches, Inc.
2 *et al.* agree and stipulate to an extension of time until April 29, 2021, for Defendants' response to
3 Plaintiffs' Motion For Order to Show Cause (ECF No. 9) ("Motion"), filed on April 6, 2021.

4 The following grounds are presented to support this Stipulation.

5 1. This action was originally filed in the Seventh Judicial District for the State of
6 Nevada (White Pine County).

7 2. On March 29, 2021, the U.S. Attorney's office in Reno received a copy of the
8 State-court complaint.

9 3. On April 1, 2021, Defendants filed their Notice of Removal (ECF No. 1)
10 removing this action from the State Court to the Federal Court pursuant to 28 USC § 1442(a).

11 4. On April 6, 2021, Plaintiff filed their Motion For Order to Show Cause.
12 Defendants' Response is now due April 20, 2021.

13 5. Plaintiffs' Motion includes 238 pages of exhibits.

14 6. Undersigned counsel has several other time-consuming matters scheduled this
15 month, including two dispositive briefs in two separate cases and 8 depositions in a third case.

16 7. Additional time is needed for Defendants to properly review and respond to the
17 Motion.

18 8. Undersigned counsel has been informed by Plaintiffs' attorney that they do not
19 oppose this motion.

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1 Defendants therefore request that the time for Defendants' to respond to Plaintiffs'
2 Motion be extended until April 29, 2021.

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4 Dated: April 12, 2021

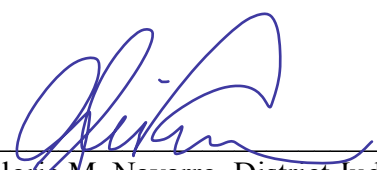
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JEAN E. WILLIAMS
Acting Assistant Attorney General
United States Department of Justice

9
10 /s/ David L. Negri
DAVID L. NEGRI, Trial Attorney
11 Environment and Natural Resources Division

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15 **IT IS SO ORDERED.**

16 Dated this 19 day of April, 2021.

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20 Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT